

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

<b>Marissa Maderazo, et al.</b>	)	
	)	
<b>Plaintiffs</b>	)	
	)	
<b>vs.</b>	)	<b>No. 5:2006-cv-00535</b>
	)	<b>(W.D. Tx., San Antonio Division)</b>
<b>VHS San Antonio Partners, LLC d/b/a</b>	)	
<b>Baptist Health System, et al.,</b>	)	<b>No. 8:15-cv-348</b>
	)	
<b>Defendants.</b>	)	

**MOTION TO QUASH SUBPOENAS OR, ALTERNATIVELY, FOR PROTECTIVE  
ORDER**

Non-parties Aureus Nursing, LLC and Aureus Radiology, LLC (together, "Aureus") hereby respectfully move to quash the two subpoenas served upon them by Defendant Baptist Health System ("Baptist") on September 11, 2015 or, alternatively, for a protective order. As grounds therefore, Aureus states that the subpoenas (1) are overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence; (2) require production of confidential trade secret materials; (3) require attendance beyond the geographical limits specified in Rule 45(c); and (4) fail to allow a reasonable time to comply. Consequently, the subpoenas violate the terms of Fed. R. Civ. P. 26 and 45 and should be quashed.

In support of their motion, Aureus submits herewith their Memorandum of Law in Support of their Motion to Quash Subpoenas or, Alternatively, for Protective Order, as well as supporting affidavits from Scot Thompson and Joseph Webb.

WHEREFORE, non-parties Aureus Nursing, LLC and Aureus Radiology, LLC respectfully request that this Court quash the subpoenas issued by Defendant Baptist,

or, alternatively, enter a protective order preventing the discovery of Aureus' confidential commercial information. Pursuant to Fed. R. Civ. P. 45(c)(1), Aureus also requests that this Court award Aureus reasonable attorneys' fees.

Dated: September 22, 2015

Respectfully submitted,

/s/Christopher R. Hedican

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ATTORNEYS FOR MOVANTS

AUREUS NURSING, LLC AND AUREUS

RADIOLOGY, LLC

**RULE 26(c) CERTIFICATE**

Pursuant to Rule 26(c)(1), the undersigned hereby certifies that the movants have, in good faith, attempted to contact David Hanselman, counsel for Baptist Health System, regarding the above motion. Counsel for movants was unable to speak with Mr. Hanselman prior to the filing of this motion.

/s/Christopher R. Hedican

Christopher R. Hedican

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing pleading was sent by email and U.S. Mail, on this 22nd day of September, 2015, to the following:

David Hanselman, Counsel for Baptist Health System  
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/s/Christopher R. Hedican  
Christopher R. Hedican